IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

Sonya Coley, Ebony Hall, Sonya Johnson, § Mossa Jones, Ruth Richardson, Salika § Taylor, Elizabeth Wright, Thomas Pope, \$ \$ \$ \$ \$ Plaintiffs. Civil Action No. 12-cv-5565 (Chen, J)(Reyes, M.J.) v. § VANNGUARD URBAN IMPROVEMENT § MOTION FOR DEFAULT JUDGMENT ASSOCIATION, INC., Thomas C. Hansard, Jr., Individually & § as Chairman of the Board of Directors, Arthur H. Niles, Executive Director/General § Manager of Vannguard Urban Improvement § Association, Inc., Vannguard Local § Development Corp., Inc., 1686 Gates § General Partners Corp., Malcolm 1677 \$ \$ \$ \$ \$ General Partners Corp., 1659 Hancock General Partners Corp., 1661 Macon General Partners Corp., Defendants.

MOTION FOR DEFAULT JUDGMENT

Plaintiffs, Sonya Coley, Ebony Hall, Sonya Johnson, Mossa Jones, Ruth Richardson, Salika Taylor, Elizabeth Wright and Thomas Pope, by and through their counsel, Irene Donna Thomas, Esq., hereby moves the Court pursuant to Federal Rule of Civil Procedure 55(b) and Local Civil Rule 55.2 to enter default judgment in favor of plaintiffs and against defendants (1) Vannguard Local Development Corp., Inc., (2) 1686 Gates General Partners Corp., (3) Malcolm 1677 General Partners Corp., (4) 1659 Hancock General Partners Corp., and (5) 1661 Macon General Partners Corp. on the grounds that said defendants failed to answer or otherwise defend against the complaint.

Dated: Brooklyn, New York

July 23, 2014

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Vannugard Local Development Corp., Inc., c/o Arthur H. Niles, Executive Director 1686 Gates General Partners Corp., c/o Arthur H. Niles, Executive Director Malcolm 1677 General Partners Corp., c/o Arthur H. Niles, Executive Director 1659 Hancock General Partners Corp., c/o Arthur H. Niles, Executive Director 1661 Macon General Partners Corp., c/o Arthur H. Niles, Executive Director

(1) Vannguard Local Development Corp., Inc., (2) 1686 Gates General Partners Corp., (3) Malcolm 1677 General Partners Corp., (4) 1659 Hancock General Partners Corp., and (5) 1661 Macon General Partners Corp.